



1 I, Stephanie Kaufman, declare under penalty of perjury under the laws of the United States  
2 of America that the following is true and correct:

3 1. I am an attorney at the law firm of Irell & Manella LLP, counsel for Plaintiff  
4 SmithKline Beecham Corporation d/b/a GlaxoSmithKline ("GSK") in this action. I am a member  
5 in good standing of the State Bar of California and am admitted to practice before this Court. I  
6 have personal knowledge of the facts set forth in this declaration and, if called as a witness, could  
7 and would testify competently to such facts under oath.

8 2. The Declaration of Sara M. Bason in Support of GSK's Opposition to Motion of  
9 Abbott Laboratories to Transfer Pursuant to 28 U.S.C. § 1404(a) includes the approximate value  
10 of gross sales of protease inhibitors that GSK generated in both California and Illinois for the  
11 years 2005 to 2007, as well as the percentage of total gross sales in the United States that these  
12 values represented. GSK treats this information, which provides sensitive financial data on GSK's  
13 sales patterns, as confidential and does not release it to the public. The sealable portions of this  
14 document have been redacted from the public version of this filing, and an unredacted version of  
15 this document has been lodged with the Court. In the unredacted version, the sealable portions are  
16 identified by shaded highlighting, pursuant to Civil Local Rule 79-5(c)(3)-(4).

17 3. Attached as Exhibit C of the Declaration of Trevor V. Stockinger in Support of  
18 GSK's Opposition to Motion of Abbott Laboratories to Transfer Pursuant to 28 U.S.C. § 1404(a) is  
19 a true and correct copy of an email with attachment from Jodi L. Devlin to other Abbott  
20 employees, dated September 6, 2002, and bearing the bates numbers NOR 00013357-59. This  
21 document was also submitted as Exhibit 15 of the Expert Report of Douglas F. Greer, Ph.D  
22 submitted in *In re Abbott Laboratories Norvir Antitrust Litigation*, Case No. C-04-1511 CW. The  
23 document was produced in the related case *In re Abbott Laboratories Norvir Antitrust Litigation*,  
24 Case No. C-04-1511 CW and the case at bar.. This document has been designated "Highly  
25 Confidential Attorneys' Eyes Only" by Defendant. Exhibit C has been omitted from the public  
26 filing.

27 4. GSK's Opposition to Motion of Abbott Laboratories to Transfer Pursuant to 28  
28 U.S.C. § 1404(a) refers to and discusses the above described GSK confidential sales information

1 included in the Declaration of Sara M. Bason, and Exhibit C attached to the Declaration of Trevor  
2 V. Stockinger and designated as "Highly Confidential Attorneys' Eyes Only" by Defendant. The  
3 sealable portions of this document have been redacted from the public version of this filing, and an  
4 unredacted version of this document has been lodged with the Court. In the unredacted version,  
5 the sealable portions are identified by shaded highlighting, pursuant to Civil Local Rule 79-  
6 5(c)(3)-(4).

7 Executed in Los Angeles, California, this 14th day of February, 2008.

8  
9   
10 Stephanie Kaufman  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28